

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, TW-A325  
Washington, DC 20554

August 4, 1999

**RE: Low Power FM Stations (MM Docket 99-25)**

Dear FCC,

My name is Tom Bunch. I am an Artist Manager and Music Concert Promoter. My management company, TAB Management, is based in Venice, California, and my concert promotion company, TAB Tours Inc., is based in New Orleans, Louisiana. I am incredibly excited about your proposal to license new low power radio stations.

Below are my thoughts on how I (along with a few business associates and investors) would like to use the proposed LPFM stations.

What I am proposing will help put Rock Radio back into the picture as a creative, profitable, fun way to advertise, express community views, and live a fun life full of music and entertainment as well as give local communities voices, provide local, national & international musicians a forum to be heard, and create a new way for local, regional & national companies to advertise inexpensively to a focused target audience.

Rock Radio, a staple of American entertainment since the 70's, has been split into so many different formats that it has lost its focus and strength. After consolidation there is no longer strong competition or a connection to the community, with the DJ's playing a lesser and lesser role in the programming and personality of the stations. Consolidation has reduced the amount of exposure to diverse types of music and entertainment, and it has placed the decision-making process of what is heard by the American public into the hands of a very few Radio programmers and consultants. Throughout the 70's, 80's & 90's there were 2 Rock Radio stations in almost every major and middle sized market in the U.S. There was fierce competition between those 2 stations for advertising dollars and for promotions with Concerts, Record Labels, Movie Companies, and local community promotions. When the FCC deregulated FM Radio major companies (SFX, Jacor, Clearcom, etc.) bought 3 or 4 stations in the same market and split up the Rock Radio format into Modern Rock, AAA, and Classic Rock/Mainstream Rock/Active Rock. Their thought was why own 1 Rock station in a market when you can own 3 or 4. The real reason is that there is not enough good Music to program 3 different Rock formats. With corporate ownership you lose the connection to the community, and you lose competition (the energy that kept Rock Radio vibrant, creative and alive).

The way I see these LPFM Rock stations working best is for them to be an amalgamation of 3 Radio styles:

- 1) 1/3 Old School Free Form FM Radio
- 2) 1/3 Listener Sponsored Community Oriented Radio
- 3) 1/3 Commercial Radio

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**1/3 Old School Free Form FM Radio** - where the play list is a Top 65 instead of a Top 30 or a Top 40; where old music and new music are played side by side; where album tracks are played as well as the single; where the DJ has a personality and a say in what gets played; where a station with strong roots in the local community has many events sponsored by local and national advertisers for the listening audience

**1/3 Listener Sponsored Community Oriented Radio** - with local community members having specialty shows sponsored by local businesses at night and on the weekends that showcase a specialized type of music that the DJ/community member has an expertise in (usually connected with his/her day job) i.e. a DJ at a local club, record store or restaurant owner, local musician, local newspaper columnist, etc.

**1/3 Commercial Radio** - where a station sells local and national advertisements

The key to these LPFM Rock stations is to own 5 to 10 stations (limited to 1 per market in a middle or large market). With ownership of 5 to 10 stations it will be possible to attract national advertisers (i.e. Major Record Labels & Movie Companies, Beer & Soda Pop Companies, Car Manufacturers, etc.). These national companies will buy LPFM Rock advertisements if they can purchase spots on 10 LPFM stations that reach the same amount of people as 3 large Rock stations as long as they can talk to 1 person or company to place their spots. Given lower overhead and less out-of-pocket money to run the LPFM stations, we will be able to offer very competitive Ad rates to national advertisers, making it possible to have very reasonable rates for local businesses to advertise (i.e. Local Car Dealerships, Restaurants, Clubs, Retail Shops, Hair Salons, Local TV stations, etc.).

National advertisers like Major Record Labels, Movie Companies, Beer & Soda Pop Companies, Car Manufacturers, etc. will use these stations for large promotions surrounding Movie and Record releases and allow for tie-ins with local businesses to support new music artists, new Movies, and new products. Local advertisers will be very happy with the national tie-ins as this will increase their profile and connect them with national advertisers. National advertisers will be pleased to have such a focused and inexpensive way to reach a target audience.

The target audience is males and females 18 - 35. Many of the specialty shows target:

- Males and females 18 - 25  
> New Music

- Males and females 25 - 50
  - > Classic Rock
  - > Reissue LP's
  - > Grateful Dead/Hippie Music/Jam Bands
  - > Local Music
  - > Interviews & Talk Shows

The idea is to make the spectrum of ages reached a wide range (16 - 50). These stations will offer enough diversity that a 40 year old father and his 18 year old son will both find something to listen to and enjoy.

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In corporate American Radio after consolidation the need for profit outweighs the needs of the community. With LPFM Rock Radio as I propose, the needs of the community will work hand in hand with the needs of profit. This will promote additional diversity in Radio voices and program services and provide the opportunity for individual citizens and small groups of citizens to operate Radio. It will also allow people of limited financial means to have a voice in American Radio. I expect that 10 LPFM1000 stations could be constructed for less than purchasing 1 full power station in a medium to large market.

For what I am proposing, a 3000 watt station class (where it would work without interfering with pre-existing stations) would be better for national and local advertisers, and it would make it a more lucrative business proposition. It would also make it possible to reach a larger number of people, including people in their cars.

Thank you for your consideration of my comments.

Sincerely,

Tom A. Bunch  
TAB Management